

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

*Plaintiffs,*

v.

PAM BONDI, Attorney General of the United States; SCOTT BESENT, Secretary of the Treasury; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, Director of the Financial Crimes Enforcement Network; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

*Defendants.*

Civil Case No. 5:25-cv-00344-FB

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DECLARATION OF EFRAIN SALINAS  
PRESIDENT OF SAN ISIDRO MULTI-SERVICES, INC.

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I, Efrain Salinas, being of competent mind, declare as follows:

1. I am a United States citizen and a resident of McAllen, Texas. I am 69 years old.
2. I am the President of San Isidro Multi-Services, Inc. a Texas corporation, which is

a plaintiff in the above-captioned civil action.

3. I manage San Isidro Multi-Services, Inc. on a day-to-day basis. I have the authority to speak for San Isidro Multi-Services, Inc.

4. San Isidro Multi-Services, Inc. is registered with the federal Financial Crimes Enforcement Network (“FinCEN”) as a Money Services Business (“MSB”) because it offers currency exchange services. Further San Isidro Multi-Services, Inc. has a currency exchange license (CEX) through the Texas Department of Banking. San Isidro Multi-Services, Inc. does not have a money transmitter license. Therefore, San Isidro Multi-Services, Inc. solely deals in cash and focuses in currency exchange from U.S. dollars to Mexican Pesos, and vice-versa.

5. Because it offers those services in GTO-affected zip codes 78503, 78557, 78577 San Isidro Multi-Services, Inc. is subject to FinCEN’s March 14, 2025, geographic targeting order (the “Border GTO”) requiring MSBs to file Currency Transaction Reports (“CTRs”) for cash transactions over \$200.

6. I estimate that at least 25% of the transactions (one out of every four transactions) that we process are for more than \$200 and would require a CTR under the Border GTO.

7. I know that a CTR is currently required for cash transactions exceeding \$10,000. Before the Border GTO came into effect, 115 CTRs were prepared and submitted in 2024.

8. The Border GTO is going to radically increase the number of CTRs that we have to file from 115 CTRs in 2024, to over 39,460 CTRs. In essence, from approximately 10 CTRs filed per month to over 3,288 CTRs that would be required to be filed per month on average. In a typical month in 2024, we had an average of 3,288 cash transactions over \$200 within the covered zip codes.

9. If transaction volume remains the same as in 2024 under the Border GTO, filing all

of those additional CTRs would approximately take about 30 minutes per CTR resulting in nearly 1,645 hours required of additional time per month to prepare, process and file the CTRs. Our employees simply do not have that additional time per month to fill out all that additional paperwork.

10. Under our current procedures, we collect some customer information for some kinds of transactions. As part of our currency exchange license requirement and to comply with the rules and regulations set forth by the Texas Department of Banking, we are required to collect and provide customer information for transactions over \$1,000. This information is available and provided to the Texas Department of Banking during routine audits. Further, this information is also made available during routine IRS Title 31 Bank Secrecy Act exams.

11. We value our customers' privacy, and when we collect information from our customers we comply with all applicable privacy laws.

12. We also value the privacy of our business records, and we treat information about transactions at our business as proprietary business information.

13. We currently conduct some transactions over \$200 but below \$1,000 without collecting any information from our customers. For transactions exceeding \$1,000, the Texas Department of Banking requires us to collect certain customer information and that information is made available during routine audits.

14. The Border GTO forces us to collect information on our customers that we would not otherwise collect and to report information to the federal government that we would not otherwise report.

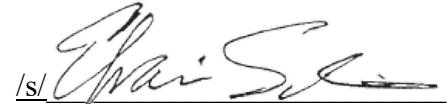
15. Many customers will not want to provide their sensitive personal information every time they do legal, low-dollar, everyday transactions. And, since the Border GTO does not apply

to every zip code, they can take their business to other businesses that are not affected.

16. The Border GTO will either drive away our customers or, if it does not, will impose massive and unsupportable compliance costs. Either way, the impact on our business will be catastrophic. Notably, over 80% of transactions at two locations that primarily service customer traveling from Mexico into the U.S. to conduct day-to-day business and purchase U.S. dollars to spend those dollars in the local economy will be catastrophically impacted.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 19th day of April, 2025.

  
/s/ Efrain Salinas  
Efrain Salinas